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PROPOSED COUNSEL FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:	§	Chapter 11
	§	
TOTAL DIAGNOSTIX LABS, LLC,	§	Case No. 18-40938-RFN11
	§	
Debtor.	§	

**DEBTOR'S MOTION REQUESTING AN EXTENSION OF TIME TO FILE
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

COMES NOW Total Diagnostix Labs, LLC (the "Debtor"), as debtor in possession, and files its Motion Requesting an Extension of Time to File Schedules and Statement of Financial Affairs ("Motion"), and respectfully represents as follows:

I. JURISDICTION AND VENUE

1. The Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue is proper before the Court under 28 U.S.C. §§ 1408 and 1409.

II. BACKGROUND

2. On March 7, 2018 (the "Petition Date"), the Debtor commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtor continues to operate

its business and manage its property as debtor in possession.

3. As of this time, the United States Trustee has not appointed an official committee of unsecured creditors. No trustee or examiner has been requested or appointed in this chapter 11 case.

III. THE DEBTOR'S BUSINESS

4. The Debtor provides the administrative, financial and marketing support for a laboratory that is owned and operated by a wholly owned subsidiary of Debtor. The bulk of the activities of Debtor over the last year have been dedicated to defending itself in lawsuits as Defendant.

IV. RELIEF REQUESTED

5. The Debtor seeks entry of an order providing an extension of the period in which to complete its (a) schedules of assets and liabilities; (b) schedule of executory contracts and unexpired leases; (c) schedule of co-debtors; (d) statement of financial affairs; and (e) list of equity security holders (collectively, the "Schedules and Statements") as required by section 521 of the Bankruptcy Code, Bankruptcy Rule 1007, and N.D. Tex. L.B.R. 1007-1. The current deadline for filing the Schedules and Statements for the Debtor is March 21, 2018. The Debtor seeks an extension to file its Schedules and Statements through and including April 20, 2018.

6. The Debtor submits that cause exists to grant the requested extension to file the Schedules and Statements pursuant to Bankruptcy Rule 1007(c). The Debtor believes that additional time beyond the current March 21, 2018 deadline will be required to locate and compile the documents and financial information necessary to prepare the Schedules and Statements. The amount of time required to prepare the Schedules and Statements, in addition to the time required for the Debtor to fulfill other burdens associated with the commencement of this case, necessitate the extension requested herein.

7. The extension requested herein will not prejudice any creditor or other party in interest. The meeting of creditors pursuant to section 341 of the Bankruptcy Code is currently scheduled to commence on May 4, 2018. If this Motion is granted, the Schedules and Statements will be filed in advance of the meeting of creditors, with sufficient time being afforded to all creditors and parties in interest to review such Schedules and Statements prior to the meeting of creditors.

V. COMPLIANCE WITH LOCAL BANKRUPTCY RULE 1007-1

8. Pursuant to Local Bankruptcy Rule 1007-1, the undersigned represents that the United States Trustee has consented to the relief requested in the Motion.

PRAYER

The Debtor respectfully requests entry of an order granting: (i) the relief requested herein and extending its deadline to file the Schedules and Statements to April 20, 2018; and (ii) such further relief as is just and proper.

Dated: March 20, 2018.

Respectfully submitted,

/s/ Jeff P. Prostok

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CERTIFICATE OF SERVICE

On March 20, 2018, a true and correct copy of the foregoing document was served on all persons receiving notice and service of pleadings through the Court's CM/ECF system. In addition, the foregoing document was emailed to Erin Schmidt with the Office of the U.S. Trustee on March 20, 2018.

/s/ Jeff P. Prostok

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